

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

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WINFORD DALLAS JONES, :
Plaintiff : Civil Action No.7:06-CV-00547

v. :

C.H. ROBINSON :

WORLDWIDE, INC., et al., :

Defendants/Third Party :

Plaintiffs :

v. : PAGES 1 through 192

AKJ ENTERPRISES, INC., :

d/b/a Unlimited Express :

and ELSON BOLAR and :

DONNIE BOLAR, :

Third Party Defendants :

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Deposition of Annette M. Sandberg, Esquire

Washington, DC

Tuesday, March 18, 2008

Reported by: Joanne Liverani, RMR JOB NO. 186251

EXHIBIT

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tabbies

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March 18, 2008

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9:55 a.m.

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7 Deposition of Annette M. Sandberg, Esquire, held at the
8 offices of:

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10 Baker Hostetler

11 Washington Square

12 Suite 1100

13 1050 Connecticut Avenue, Northwest

14 Washington, DC 20036-5304

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16 Pursuant to notice, before Joanne Liverani, RMR, a
17 Notary Public of the District of Columbia.

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1 Q So financial issues will drive a company
2 to put bad equipment and bad drivers on the road?

3 A That's one, yes.

4 Q And so if a company has cash flow
5 problems, they're likely to cut corners which will
6 result in bad equipment and bad drivers; is that
7 correct?

8 A Some do, yes.

9 Q Are you familiar with any studies that
10 actually correlate those things, correlate the
11 finances of a carrier with putting bad equipment or
12 bad drivers on the road?

13 A That specific issue, no.

14 Q I think we've been through the portion
15 of your report, which again, is marked as
16 Exhibit 2, that details your background up to the
17 point that you came to Washington, DC as opposed to
18 Washington state; correct?

19 A The only thing you didn't cover was my
20 last law job before I left Washington state.

21 Q Okay. All right.

22 A But that was a short period of time.